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12 Attorneys for Plaintiffs/Counterdefendants

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 ALLSTATE INSURANCE COMPANY,  
17 ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
18 INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,  
MD, RUSSELL J. SHAH, MD, LTD., DIPTI  
23 R. SHAH, MD, LTD., and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
24 URGENT CARE, DOES 1-100, and ROES  
101-200,

25 Defendants.

26  
27 AND RELATED CLAIMS  
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE ZHENGYI  
LAW GROUP INTO THE STIPULATED  
CONFIDENTIALITY AND PROTECTIVE  
ORDER (ECF NO. 39) FOR THE  
DISCLOSURE OF DOCUMENTS  
PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and  
4 ZHENGYI LAW GROUP (non-party herein after referred to as "ZHENGYI") hereby stipulate and  
5 agree as follows:

6 1. Plaintiffs served ZHENGYI with a subpoena pursuant to F.R.C.P. 45 for the production  
7 of documents regarding communications and payments made by and between Law Firm and the  
8 Defendants during ZHENGYI's representation of certain clients in personal injury claims for which  
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. ZHENGYI is aware that Plaintiffs have subpoenaed several law firms seeking the same  
11 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
12 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH ("Belsky")*.

13 3. ZHENGYI understands that this Court presides over both the instant matter as well as  
14 the *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law  
15 firms to produce the same type of documents request of ZHENGYI.

16 4. A stipulated confidentiality and protective order in this case entered between Plaintiffs  
17 and Defendants for the disclosure of confidential, sensitive or other protected information was  
18 approved by this Court on May 20, 2016. (ECF No. 39).

19 5. ZHENGYI was not a party to the stipulated confidentiality and protective order. (ECF  
20 No. 39).

21 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also  
22 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

23 7. In accordance with this Court's prior rulings both in this action and in the *Belsky*  
24 matter, the parties hereby stipulate and agree that the protections and scope articulated in the  
25 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.  
26 39) be extended in their entirety to cover ZHENGYI in its compliance with Plaintiffs' subpoena.

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1 8. ZHENGYI will produce all documents responsive to the subpoena within ten (10) days  
2 of approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/3/19

Dated: January 2, 2019

5 McCORMICK, BARSTOW, SHEPPARD,  
6 WAYTE & CARRUTH LLP

ZHENGYI LAW GROUP LTD.

7 By: \_\_\_\_\_

By: /s/ Andrew J. VanNess

8 DYLAN P. TODD, ESQ.

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11  
12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 14 day of January, 2019.

15  
16   
17 UNITED STATES MAGISTRATE JUDGE  
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